

Circuit City Stores, Inc.  
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November 20, 2004

Jennifer J. Johnson, Secretary  
Board of Governors of the Federal Reserve System  
20<sup>th</sup> Street and Constitution Avenue, N.W.  
Washington, DC 20551

Re: Proposal to Amend Regulation E – Electronic Fund Transfer Act  
Docket No. R-1210

Dear Ms. Johnson:

Please accept this letter as the comment of Circuit City Stores, Inc. ("Circuit City") to the proposal to amend Regulation E which implements the Electronic Fund Transfer Act ("Reg. E").

Circuit City is a Virginia corporation that operates over 600 consumer electronics retail stores throughout the United States and has a substantial Internet retail operation. My title is AVP Accounting Operations and in that capacity I am responsible for pay type acceptance procedures at Circuit City. Circuit City is also a member in good standing with the National Retail Federation ("NRF") which is the world's largest retail trade association, with membership that comprises all retail formats and channels of distribution including department, specialty, discount, catalog, Internet and independent stores as well as the industry's key trading partners of retail goods and services.

Circuit City has reviewed the proposal to amend Reg. E and has numerous concerns about the impact to its organization and retail in general. Circuit City understands that the NRF has filed comments on behalf of its members to the proposed amendments. Circuit City has reviewed those comments and agrees wholeheartedly with the concerns and comments put forth by the NRF. Please accept this letter as support for the NRF position, which Circuit City adopts as its own for purposes of this filing. We do wish to point out two aspects of the NRF comments involving particular circumstances for Circuit City.

First, Circuit City wants to point out that it does not currently use payroll cards in its business. However, since we are always exploring our options there could be a time in the future where that product is considered. In reviewing the NRF comments – we feel that the NRF's positions are well founded. Second, Circuit City locations have many dispersed checkout areas throughout the store. If it is required that a retailer post any signage - we would advocate that the burden of any signage requirements for retailers be minimized to allow for one sign to be utilized

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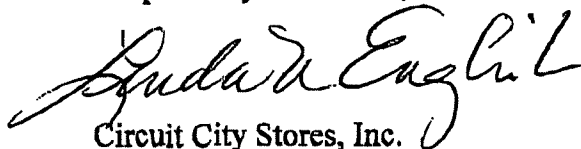
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in each store and to have any requirements for notices be easy to understand and short as the NRF has outlined in their comments.

Circuit City appreciates the chance to comment on these proposed amendments and participate in the public debate. Circuit City believes that the proposed amendments in their current form will have a negative effect and put unnecessary burden on all retailers throughout the United States, including Circuit City. Circuit City respectfully requests that the Federal Reserve take into account the NRF comments and this letter when considering the proposed amendments.

Thank you for your attention to this letter.

Respectfully Submitted,



Circuit City Stores, Inc.

By: Linda English

AVP Accounting Operations

cc: W. Stephen Cannon, General Counsel – Circuit City Stores, Inc.  
Mallory Duncan, General Counsel – National Retail Federation  
Frank Telegadas, Asst. Gen Counsel – Circuit City Stores, Inc.